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*Attorneys for Defendants
AT&T Mobility LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BARRY HALL, *et al.*,

Plaintiffs,

v.

AT&T MOBILITY LLC f/k/a CINGULAR
WIRELESS LLC, *et al.*,

Defendants.

Civil Action No. 07-05325 (JLL)

**DECLARATION OF JOEL K. BOTZET
REGARDING SETTLEMENT
ADMINISTRATION
SERVICES AND COMPLIANCE AND
CAFA MAILING**

I, JOEL K. BOTZET, declare and say as follows:

1. I am a Senior Project Administrator with Rust Consulting, Inc. ("Rust Consulting"). My business address is 625 Marquette Avenue, Suite 880, Minneapolis, Minnesota 55402. My telephone number is 612-359-2035. I am over twenty-one years of age and authorized to make this declaration on behalf of Rust Consulting. Except as otherwise stated, I am fully familiar with and

1 have personal knowledge of the matters in this declaration and am competent to testify about them
2 if called upon to do so.

3 2. Rust Consulting is the Settlement Administrator for the AT&T Mobility LLC
4 ("AT&T Mobility" or "ATTM") settlement in the above-captioned action. Rust Consulting has
5 extensive experience in class action matters, having provided services in class actions involving
6 antitrust, securities fraud, property damage, employment discrimination, product liability, insurance
7 and consumer issues. Combined, we have provided services in more than 2,500 matters, including:
8 *In re Compact Disc Minimum Advertised Price Antitrust*, MDL No. 982 (U.S. Dist. Ct. W.D. Pa.),
9 music products price-fixing settlement; *In re Waste Management, Inc. Securities Litigation*, Master
10 File Number H-99-2183, securities settlement; *McNeil v. American General Life & Accident Co.*,
11 Case No. 3-99-1157 (U.S. Dist. Ct. M.D. Tenn. Nashville Div.), industrial life insurance settlement;
12 *Naef v. Masonite Corp.*, No. 94-4033 (Ala. Cir. Ct., Mobile Co.), hardboard siding defective
13 product settlement; *In re FTD.COM, Inc. Shareholders Litigation*, Consolidated C.A. No. 19458-
14 NC, securities settlement; *In re Metropolitan Life Ins. Co.*, Misc. Docket No. 96-179 MDL No.
15 1091 (U.S. Dist. W. D. Pa.), life insurance market conduct settlement; *Benacquisto v. American*
16 *Express Financial Corp.*, No. 00-1980 DSD, No. 96-18477, No. 97-4742, No. 98-15681 (U.S. Dist.
17 Ct., D. Minn.), annuity and life insurance and market conduct settlements; *Coordination*
18 *Proceedings Special Title (Rule 1550(b)) Microsoft I-V Cases*, Case No. J.C.C.P. No. 4106 (Sup.
19 Ct., San Francisco, Cal.), consumer software settlement; and numerous other cases.

20 3. I submit this declaration regarding settlement administration services pursuant to
21 Paragraph 10 of the Court's Preliminary Approval Order dated November 5, 2010 ("Preliminary
22 Approval Order"), and Paragraph 4 of the Court's Amended Order Rescheduling Hearing
23 Regarding Final Approval of Proposed Settlement and Related Deadlines dated April 2, 2010.
24
25
26

1 Exhibit B. The CAFA Notice was served along with a CD containing electronic PDF copies of the
2 pleadings and documents. A list of the documents included in the mailing is attached as Exhibit C.
3 Rust Consulting confirmed that each CAFA Notice was delivered at the addressee's office.

4 **PRINTING AND MAILING OF THE MAIL NOTICE**

5 6. Working with counsel, Rust Consulting formatted the Court-approved Mail Notice
6 for mailing. After receiving approval from counsel, a sufficient number of Mail Notices were
7 printed according to the anticipated class size.

8
9 7. Huron Consulting Group, data consultant to ATTM on this matter, provided Rust
10 Consulting with records for a total of 1,234,440 accounts containing names and last known
11 addresses for the ETF Payer Class Member List. Rust Consulting verified and updated the ETF
12 Payer Class Member List address information through the National Change of Address database
13 ("NCOA"). NCOA contains all requested changes of address which have been filed within the last
14 forty-eight months with the United States Postal Service and are currently in effect. Addresses from
15 the Class Member list were cross-referenced with addresses found in the NCOA cards filed with the
16 United States Postal Service. The Coding Accuracy Support System ("CASS") was also utilized to
17 standardize the addresses in the Class Member List to ensure that they conformed to National Postal
18 Service Rules by using a computer program designed for that purpose. After elimination of
19 duplicate records, the ETF Payer Class Member List consisted of 1,177,231 records.
20

21 8. Rust Consulting retained a printing and mailing service to print and mail individual
22 Mail Notices. Rust Consulting oversaw the print and mail process.

23
24 9. Pursuant to paragraph 10(a) of the Court's Order of November 4, 2009, preliminarily
25 approving the Settlement, between January 29, 2010 and February 12, 2010, Rust Consulting
26 caused a total of 1,177,231 Mail Notices to be mailed by First-Class Mail to the Persons on the ETF
27

1 Payer Class Member List. A copy of the Mail Notice is attached as Exhibit D.

2
3 **PUBLICATION OF THE SHORT-FORM PUBLICATON NOTICE**

4 10. Pursuant to paragraph 10(c) of the Court's Order of November 4, 2009, preliminarily
5 approving the Settlement, Rust Consulting caused the short-form Publication Notice to be published
6 in seven newspapers (the *Dallas Morning News*, the *New York Times*, the *Los Angeles Times*, the
7 *Chicago Tribune*, the *Philadelphia Inquirer*, the *San Francisco Chronicle*, and the *Washington*
8 *Post*) for two consecutive weeks, on January 11, 2010 and January 18, 2010. The short-form
9 Publication Notice was also published in *USA Weekend* on January 10, 2010 and in *Parade*
10 magazine on January 17, 2010. A copy of the short-form Publication Notice is attached as Exhibit
11 E to this declaration. A list describing the newspapers, the publication dates and locations where
12 the short-form Publication Notices appeared within the newspapers is attached to this declaration as
13 Exhibit F.
14

15
16 **SETTLEMENT WEBSITE (www.attmetfsettlement.com)**

17 11. Rust Consulting created and continues to maintain the settlement website. The
18 following internet address was reserved, www.attmetfsettlement.com. The Internet address is
19 provided in the Notice and on the automated Interactive Voice Response System. The website has
20 the long-form Publication Notice, Order Granting Preliminary Approval to Proposed Settlement, the
21 Settlement Agreement, Plan of Allocation, Claim Form with instructions, answers to frequently
22 asked questions, and contact information for the Settlement Administrator and Class Counsel posted
23 in English and Spanish. In addition, an electronic Claim Form allows Class Members to file claims
24 online in English and in Spanish.
25

26 12. As of May 22, 2010, there have been 230,429 unique visits to the website.
27

INCOMING MAIL

13. Rust Consulting established a post office box, P.O. Box 2266, Faribault, MN 55021-2386, for receipt of Claim Forms, requests for exclusion from the class, and other correspondence. Mail received at the post office box is collected and processed daily.

TELEPHONE SUPPORT

14. A toll-free telephone number was established and identified in the Notice and website for the purpose of allowing potential Class Members to call and receive information regarding the Settlement. The toll-free telephone established is 1-888-228-0885.

15. The toll-free number connects callers with an automated Interactive Voice Response system that provides a recorded message including a brief summary of the proposed Settlement and the option to select one of several more detailed recorded messages addressing frequently asked questions in English and Spanish. Callers also have the option of requesting a Notice and Claim Form. The toll-free line and recorded information is open 24 hours a day, 7 days a week.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 28th day of May 2010, at Minneapolis, Minnesota.


JOEL K. BOTZET

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BARRY HALL, et al.,

Plaintiffs,

v.

AT&T MOBILITY LLC f/k/a CINGULAR
WIRELESS LLC, et al.,

Defendants.

Civil Action No. 07-05325 (JLL)

**DEFENDANT AT&T MOBILITY LLC'S NOTICE OF
CLASS SETTLEMENT PURSUANT TO 28 U.S.C. § 1715**

Defendant AT&T Mobility LLC, by its undersigned attorneys and on behalf of itself and its predecessor entities ("Defendants"), hereby gives notice pursuant to 28 U.S.C. § 1715, part of the Class Action Fairness Act, codified in scattered sections of 28 U.S.C., of the proposed settlement (the "Settlement") of the above-captioned class action (the "Action") as follows.

By way of background, the Action is pending before the Honorable Jose L. Linares in the United States District Court for the District of New Jersey, and alleges that Defendants assessed, and in some cases collected, a flat-rate early termination fee ("ETF") from its subscribers in violation of various state and federal laws, and that certain of Defendants' subscriber contracts contain flat-rate ETF provisions that are unlawful under various state and federal laws. Defendants have denied these claims and have raised a number of legal and factual defenses about the legality of its rate structure. Moreover, since May 2008, Defendants have not charged flat-rate ETFs to new or renewing customers. Instead, Defendants charge such customers an ETF that is progressively lowered for every month of the contract term. *See, e.g.*, Press Release, AT&T Announces New Approach to Early Termination Fees (March 31, 2008), available at

<http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=25390>. In order to avoid a potentially lengthy and distracting dispute over their former flat-rate ETF policy, Defendants have now agreed to settle these claims. A motion for preliminary approval of the settlement was filed with the Honorable Jose L. Linares of the United States District Court for the District of New Jersey on September 15, 2009, not more than ten days ago.

This settlement is the product of an arms-length negotiation and multiple mediation sessions before a neutral mediator. Pursuant to the settlement, notice to the class will be provided by direct mailings and bill inserts, publication in various print media, and on a dedicated settlement website. Settlement Class Members may opt out of the settlement and, if they choose not to opt out, may object to the settlement and/or make a claim for monetary and/or non-monetary relief, including AT&T Long Distance Calling Cards or conversion of the ETF provision in their existing wireless service agreements from Defendants' former flat-rate ETFs to Defendants' new declining ETF. The Defendants will bear certain costs of notice and will establish a settlement fund in the amount of \$16,000,000 in cash and \$2,000,000 in non-cash compensation for purposes of paying class claims, paying other costs of notice, paying costs of claims administration, and paying any awards of attorneys' fees and costs to be approved and awarded by the Court.

The foregoing is a short summary of the proposed settlement. Detailed information about the Settlement can be found in the Settlement Agreement and the various other documents contained in the enclosed CD.

In accordance with 28 U.S.C. § 1715(b)(1)-(b)(8), Defendants state as follows:

1. The enclosed CD contains copies of the Complaint, First Amended Complaint, Second Amended Complaint, and Third Amended Complaint (and any materials filed therewith)

in Hall v. AT&T Mobility LLC, No. 07-5325 (D.N.J) (JLL) (Exhibits 1, 2, 3 & 4). For ease of reference, the enclosed CD also contains copies of the operative complaints in the actions designated as "Related Actions" in the Settlement Agreement, namely: Sasik et al. v. AT&T Wireless Services, Inc., No. 2:05-CV-2346-ABC (CWx) (C.D. Cal.) (Exhibit 5); Waldmann et al. v. Cingular Wireless LLC, No. 2:07-CV-05087-ABC (CWx) (C.D. Cal.) (Exhibit 6); Dias et al. v. AT&T Wireless Services, Inc. et al., No. BC316195 (Calif. Super. Ct., Los Angeles County) (Exhibits 7 & 8); Kinkel v. Cingular Wireless LLC, AAA WIA No. 11 494 02646 06 (AAA Arbitration) (Exhibit 9); Cherrigan et al. v. AT&T Wireless Services, et al., JCCP 4332 (Calif. Super. Ct., Alameda County) (Exhibit 10); Ayyad et al. v. Cingular Wireless LLC et al., JCCP 4332 (Calif. Super. Ct., Alameda County) (Exhibit 11); and Graber v. AT&T Wireless PCS, LLC et al., No. 50 2004CA004650MB(AI) (Florida Circuit Ct., Palm Beach County) (Exhibit 12).

2. As of the date of this Notice, the Court has scheduled a preliminary approval hearing for October 19, 2009. The Court sits in the Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, 07101. The Court has not yet scheduled a final approval hearing in connection with the proposed settlement.

3. The enclosed CD contains copies of the various proposed notifications to class members of the proposed settlement and their right to request exclusion from and object to the settlement. See Motion for Preliminary Approval of Settlement and Exhibits Thereto dated September 15, 2009 (attached collectively as Exhibit 13)

4. The enclosed CD contains a copy of the proposed settlement agreement and any exhibits thereto and any related agreements and any exhibits thereto. See Exhibit 13.

5. The parties' entire agreement is set forth in the enclosed proposed settlement agreement and related agreements. There are no other contemporaneously made agreements.

6. The Court has not issued a final judgment order and the parties have not filed a notice of dismissal.

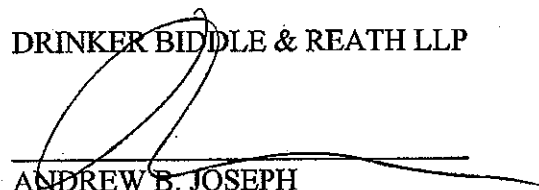
7. It is not currently feasible to provide the names of class members who reside in each State and their estimated proportionate share of the entire settlement. Accordingly, the enclosed CD contains a reasonable estimate of the number of current customers residing in each State and their estimated proportionate share of the settlement. In order to provide this information in a timely manner without potential public disclosure of confidential and proprietary business information, this estimate is based on publicly-available marketing data. See Current AT&T Mobility LLC Subscribers By State (attached hereto as Exhibit 14)

8. As of the date of this letter, there are no written judicial opinions relating to the materials described in paragraphs (3) through (6), pertaining to subparagraphs (3) through (6) of 28 U.S.C. § 1715(b).

DATED: September 24, 2009

DRINKER BIDDLE & REATH LLP

By:


ANDREW B. JOSEPH
500 Campus Drive
Florham Park, New Jersey 07932
Tel: (973) 549-7264

Attorneys for Defendants

EXHIBIT B

Hall v. AT& T Mobility

CAFA Mailing List

AddressName	LetterName	TitlePosition
HON. TROY KING	Troy King	ALABAMA OFFICE OF THE ATTORNEY GENERAL
HON. DANIEL S. SULLIVAN	Daniel S. Sullivan	ALASKA OFFICE OF THE ATTORNEY GENERAL
HON. TERRY GODDARD	Terry Goddard	ARIZONA OFFICE OF THE ATTORNEY GENERAL
HON. DUSTIN McDANIEL	Dustin McDaniel	ARKANSAS OFFICE OF THE ATTORNEY GENERAL
HON. EDMUND G BROWN	Edmund G Brown	CALIFORNIA ATTORNEY GENERAL
HON. JOHN SUTHERS	John Suthers	COLORADO OFFICE OF THE ATTORNEY GENERAL
HON. RICHARD BLUMENTHAL	Richard Blumenthal	CONNECTICUT OFFICE OF THE ATTORNEY GENERAL
HON. JOSEPH "BEAU" BIDEN III	Joseph "Beau" Biden III	DELAWARE OFFICE OF THE ATTORNEY GENERAL
HON. PETER NICKLES	Peter Nickles	DISTRICT OF COLUMBIA OFFICE OF THE ATTORNEY GENERAL
HON. BILL MCCOLLUM	Bill McCollum	FLORIDA OFFICE OF THE ATTORNEY GENERAL
HON. THURBERT E. BAKER	Thurbert E. Baker	GEORGIA OFFICE OF THE ATTORNEY GENERAL
HON. MARK J. BENNETT	Mark J. Bennett	HAWAII OFFICE OF THE ATTORNEY GENERAL
HON. LAWRENCE WASDEN	Lawrence Wasden	IDAHO OFFICE OF THE ATTORNEY GENERAL
HON. LISA MADIGAN	Lisa Madigan	ILLINOIS OFFICE OF THE ATTORNEY GENERAL
HON. GREG ZOELLER	Greg Zoeller	INDIANA OFFICE OF THE ATTORNEY GENERAL
HON. TOM MILLER	Tom Miller	IOWA OFFICE OF THE ATTORNEY GENERAL
HON. STEPHEN SIX	Stephen Six	KANSAS OFFICE OF THE ATTORNEY GENERAL
HON. JACK CONWAY	Jack Conway	KENTUCKY OFFICE OF THE ATTORNEY GENERAL
HON. JAMES CALDWELL	James Caldwell	LOUISIANA OFFICE OF THE ATTORNEY GENERAL
HON. JANET MILLS	Janet Mills	MAINE OFFICE OF THE ATTORNEY GENERAL
HON. DOUGLAS F. GANSLER	Douglas Gansler	MARYLAND OFFICE OF THE ATTORNEY GENERAL
HON. MARTHA COAKLEY	Martha Coakley	MASSACHUSETTS OFFICE OF THE ATTORNEY GENERAL
HON. MIKE COX	Mike Cox	MICHIGAN OFFICE OF THE ATTORNEY GENERAL
HON. LORI SWANSON	Lori Swanson	MINNESOTA OFFICE OF THE ATTORNEY GENERAL
HON. JIM HOOD	Jim Hood	MISSISSIPPI OFFICE OF THE ATTORNEY GENERAL
HON. CHRIS KOSTER	Chris Koster	MISSOURI OFFICE OF THE ATTORNEY GENERAL
HON. STEVE BULLOCK	Steve Bullock	MONTANA OFFICE OF THE ATTORNEY GENERAL
HON. JON BRUNING	Jon Bruning	NEBRASKA OFFICE OF THE ATTORNEY GENERAL
HON. CATHERINE CORTEZ MASTO	Catherine Cortez Masto	NEVADA OFFICE OF THE ATTORNEY GENERAL
HON. MICHAEL DELANEY	Michael Delaney	NEW HAMPSHIRE OFFICE OF THE ATTORNEY GENERAL
HON. ANNE MILGRAM	Anne Milgram	NEW JERSEY OFFICE OF THE ATTORNEY GENERAL
HON. GARY KING	Gary King	NEW MEXICO OFFICE OF THE ATTORNEY GENERAL
HON. ANDREW CUOMO	Andrew Cuomo	NEW YORK OFFICE OF THE ATTORNEY GENERAL
HON. ROY COOPER	Roy Cooper	NORTH CAROLINA OFFICE OF THE ATTORNEY GENERAL
HON. WAYNE STENEHJEM	Wayne Stenehjem	NORTH DAKOTA OFFICE OF THE ATTORNEY GENERAL
HON. RICHARD CORDAY	Richard Corday	OHIO OFFICE OF THE ATTORNEY GENERAL
HON. W.A. DREW EDMONDSON	W.A. Drew Edmondson	OKLAHOMA OFFICE OF THE ATTORNEY GENERAL
HON. JOHN KROGER	John Kroger	OREGON OFFICE OF THE ATTORNEY GENERAL
HON. TOM CORBETT	Tom Corbett	PENNSYLVANIA OFFICE OF THE ATTORNEY GENERAL
HON. PATRICK C. LYNCH	Patrick C. Lynch	RHODE ISLAND OFFICE OF THE ATTORNEY GENERAL
HON. HENRY MCMASTER	Henry McMaster	SOUTH CAROLINA OFFICE OF THE ATTORNEY GENERAL
HON. MARTY J. JACKLEY	Marty J. Jackley	SOUTH DAKOTA OFFICE OF THE ATTORNEY GENERAL
HON. ROBERT E. COOPER, JR.	Robert E. Cooper, Jr.	TENNESSEE OFFICE OF THE ATTORNEY GENERAL
HON. GREG ABBOTT	Greg Abbott	TEXAS OFFICE OF THE ATTORNEY GENERAL
HON. MARK L. SHURTLEFF	Mark L. Shurtleff	UTAH OFFICE OF THE ATTORNEY GENERAL
HON. WILLIAM H. SORRELL	William H. Sorrell	VERMONT OFFICE OF THE ATTORNEY GENERAL
HON. BILL MIMS	Bill Mims	VIRGINIA OFFICE OF THE ATTORNEY GENERAL
HON. ROB MCKENNA	Rob McKenna	WASHINGTON OFFICE OF THE ATTORNEY GENERAL
HON. DARRELL V. MCGRAW Jr.	Darrell V. McGraw Jr.	WEST VIRGINIA OFFICE OF THE ATTORNEY GENERAL
HON. J. B. VAN HOLLEN	J. B. Van Hollen	WISCONSIN OFFICE OF THE ATTORNEY GENERAL
HON. BRUCE A. SALZBURG	Bruce A. Salzburg	WYOMING OFFICE OF THE ATTORNEY GENERAL
HON. ERIC HOLDER	Eric Holder	UNITED STATES OFFICE OF THE ATTORNEY GENERAL
HON. ANTONIO SAGARDIA	Antonio Sagardia	PUERTO RICO DIRECCIÓN POSTAL
HON. VINCENT FRAZER	Vincent Frazer	US VIRGIN ISLANDS OFFICE OF THE ATTORNEY GENERAL

EXHIBIT C

Hall v. AT&T Mobility
CAFA Mailing Document List

Exhibit	Document Name
1	Class Action Complaint and Demand for Jury Trial
2	First Amended Class Action Complaint and Demand for Jury Trial
3	Second Amended Class Action Complaint and Demand for Jury Trial
4	Third Amended Class Action Complaint and Demand for Jury Trial
5	Third Amended Complaint For Violation of Consumer Projection Acts; Breach of Contract; Declaratory Relief Pursuant to 28 U.S.C. §2201; and Unjust Enrichment
6	Second Amended Complaint For Violation of Consumer Projection Acts; Breach of Contract; Declaratory Relief Pursuant to 28 U.S.C. §2201; and Unjust Enrichment
7	Fourth Amended Class Action Complaint for 1. Unlawful Business Practice in Violation of B&PC Section 17200, ET. SEQ. 2. Unlawful Business Practice in Violation of B&PC Section 17500, ET. SEQ. 3. Intentional Misrepresentation of Fact 4. Negligent Misrepresentation of Fact 5. Concealment of Fact 6. Promise Without Intent to Perform 7. Negligence Per Se 8. Unjust Enrichment 9. Breach of Contract
8	Sixth Amended Class Action Complaint for 1. Unlawful Business Practice in Violation of B&PC Section 17200, ET. SEQ. 2. Unlawful Business Practice in Violation of B&PC Section 17500, ET. SEQ. 3. Concealment of Fact 4. Breach of Contract
9	Notification Letter of Class Action Arbitration Demand to American Arbitration Association
10	Fifth Consolidated Amended Complaint [Early Termination Fees] Against AT&T Defendants
11	Fifth Consolidated Amended Complaint [Early Termination Fees] Against Cingular Defendants
12	Amended Class Action Complaint for Damages and Demand for Jury Trial
13	Notice of Joint Motion
14	Current AT&T Mobility LLC Subscribers by State

EXHIBIT D

AT&T MOBILITY ETF SETTLEMENT ADMINISTRATOR
C/O RUST CONSULTING, INC.
PO BOX 2266
FARIBAULT, MN 55021-2386

If You Paid or Had a Contract Including a Flat-Rate Early Termination Fee from AT&T Mobility,
You May Be Entitled to Benefits from a Class Action Settlement

PRESORTED
FIRST-CLASS
U.S. POSTAGE
PAID
Rust Consulting, Inc.



POSTCARD# <<PCN>>
<<NAME LINE>>
<<ADDRESS LINE 1>>
<<ADDRESS LINE 2>>
<<CITY>> <<STATE>> <<ZIPCODE>>

**Important Notice from the United States District Court
for the District of New Jersey about a Class Action Settlement**

Para ver este aviso en español, visita www.ATTMETFSettlement.com/español

A proposed Settlement has been reached in a class action lawsuit against AT&T Mobility LLC ("AT&T Mobility"). The Settlement resolves several other cases that challenge AT&T Mobility's flat-rate early termination fee ("ETF"). The lawsuit claims that AT&T Mobility's flat-rate ETF provision in its wireless telephone service contracts (generally between \$150 and \$175) is unlawful. AT&T Mobility strongly denies any wrongdoing, but has agreed to settle to avoid the burden and costs of further litigation. **You may be a Class Member if:**

- You subscribed to wireless telephone service from AT&T Mobility or its predecessors and paid or were charged a flat-rate ETF on or at any time after January 1, 1998; OR
- Your contract included a flat-rate ETF provision on or at any time after January 1, 1998.

The purpose of this Notice is to inform you of the settlement so you may decide what to do about it. If the Settlement is approved, a settlement fund of \$16,000,000 in cash and \$2,000,000 in non-cash benefits will be created. You may submit a claim to receive monetary or other benefits. Claim Forms must be submitted on-line or sent via U.S. Mail with a postmark date on or before **June 14, 2010**, but that deadline may be extended.

- **If you wish to exclude yourself** from the lawsuit and keep your right to sue AT&T Mobility on your own, you must send a request for exclusion to the Settlement Administrator via U.S. Mail with a postmark date on or before **March 24, 2010**. If you do not exclude yourself, you will be bound by the terms of the Settlement and give up your rights to sue in court or arbitration regarding issues in the case.

- **If you do not exclude yourself**, you or your lawyer has the right to appear before the Court and object to the proposed Settlement. Objections must be written and postmarked by **March 24, 2010**. Objections to the application for attorneys' fees and expenses must be received by **April 12, 2010**. You will be bound by the terms of the Settlement even if your objection is rejected.

The Court will determine whether to approve the Settlement at a Fairness Hearing on **April 14, 2010 at 10:00 a.m.** at the United States District Court for the District of New Jersey, located at 50 Walnut Street, Newark, New Jersey 07101.

For a full description of the Settlement, related Court documents, and deadlines and claim forms, please visit:
www.ATTMETFSettlement.com, Call: 1-888-228-0885

or Write: AT&T Mobility ETF Settlement Administrator, c/o Rust Consulting, Inc., P.O. Box 2266, Faribault, MN 55021-2386

EXHIBIT E

Legal Notice

Legal Notice

If You Are A Current Or Former AT&T Mobility Customer, You May Be Entitled To Benefits From A Class Action Settlement.

What is this Notice?

There is a proposed Settlement pending in a class action involving a flat-rate Early Termination Fee ("ETF") charged to customers of AT&T Mobility LLC ("AT&T Mobility") and its predecessors. The lawsuit, *Hall v. AT&T Mobility LLC*, No. 07-05325 (JLL) is pending in the U.S. District Court for the District of New Jersey. The Settlement resolves several other cases that challenge AT&T Mobility's flat-rate ETF.

What is the Lawsuit About?

The lawsuit claims that the AT&T Mobility flat-rate ETF in its wireless telephone service contracts is unlawful. AT&T Mobility strongly denies any wrongdoing, but has agreed to settle to avoid the burden and cost of further litigation. The Court has not made a decision on the merits of this case.

Who is Included?

You may be a Class Member if you are a current or former customer of AT&T Mobility or its predecessors in the U.S. and you paid or were charged a flat-rate ETF, or your contract included a flat-rate ETF provision, on or at any time after January 1, 1998. If you are not sure whether you are included, you can get more information on the Settlement website or by contacting Class Counsel identified below.

What does the Settlement Provide?

A settlement fund of \$16,000,000 in cash and \$2,000,000 in non-cash benefits will pay Class Member claims. AT&T Mobility has also agreed not to put a flat-rate ETF provision in new wireless service agreements for a minimum of 24 months. Certain costs will be deducted from the settlement fund before distribution, including Class Counsel's attorneys' fees, litigation costs and administration fees. The Settlement does not relieve Class Members from existing or future ETF obligations owed to AT&T Mobility.

Who Represents Me?

The Court has appointed attorneys ("Class Counsel") to represent you. They are the law firms of Carella, Byrne, Bain, Gilfillan & Cecchi and Strange & Carpenter; You will not be charged for their work. Class Counsel will request an award for attorneys' fees of up to \$6,000,000, plus reimbursement of expenses, from the court, to be

paid from the settlement fund. You may hire your own attorney, but only at your own expense.

What are my Legal Rights?

Get complete information about the Settlement and make a decision about your rights:

- **Remain in the Settlement Class and submit a claim.** You will be bound by the terms of the Settlement and give up your rights to sue in court or arbitration regarding issues in the case. Claim Forms must be submitted on-line or sent via U.S. mail with a postmark date on or before June 14, 2010 to the Settlement Administrator, but the deadline may be extended by the Court.
- **Exclude yourself and get no benefit from the Settlement.** You keep your right to sue on your own behalf at your own expense. Requests for exclusion must be sent via U.S. mail with a postmark date on or before March 24, 2010 to the Settlement Administrator.
- **Remain in the Settlement Class and file an objection.** You or your lawyer has the right to appear before the Court and object to the Settlement. Objections must be written and postmarked by March 24, 2010. Objections to the application for attorneys' fees and expenses must be received by April 12, 2010. Objections will be considered at the Fairness Hearing. You will be bound by the terms of the Settlement even if your objection is rejected.
- **Do nothing and do not file a claim.** You still give up your right to be part of any other lawsuit or arbitration against AT&T Mobility about issues relating to the flat-rate ETF.

When Will the Court Consider the Proposed Settlement?

The Court will determine whether to approve the Settlement at a Fairness Hearing held on April 14, 2010 at 10:00 a.m., in courtroom 5D, United States District Court for the District of New Jersey, located at 50 Walnut Street, Newark, New Jersey 07101. The Court will consider any timely filed objections at that time. If you file a timely objection, you may appear at the hearing to explain your objection, but you are not required to attend. If the hearing is relocated or rescheduled, the new location or date will be posted on the website below.

For further information and a Claim Form:

Visit: www.ATTMETFSettlement.com, or Call: 1-888-228-0885

**Write: AT&T Mobility ETF Settlement Claims Administrator,
c/o Rust Consulting, Inc., P.O. Box 2266, Faribault, MN 55021-2386**

EXHIBIT F

Page Number Report**Media Estimate - Final****Hall v. AT&T Mobility formerly 819****1/19/2010****Print Media Components of Media Estimate**

Print Media	Unit Type/Size	Date Ad(s) Ran	Page # of Ad
Newspaper(s)			
<i>Chicago Tribune</i>	1/6 Page	1/11/2010	10
<i>Chicago Tribune</i>	1/6 Page	1/18/2010	12
<i>Dallas Morning News</i>	3 columns x 7 in/cm	1/11/2010	A4
<i>Dallas Morning News</i>	3 columns x 7 in/cm	1/18/2010	A12
<i>Los Angeles Times</i>	3 columns x 7 in/cm	1/11/2010	A11
<i>Los Angeles Times</i>	3 columns x 7 in/cm	1/18/2010	A14
<i>New York Times</i>	1/6 Page	1/11/2010	B8
<i>New York Times</i>	1/6 Page	1/18/2010	B5
<i>Philadelphia Inquirer</i>	3 columns x 7 in/cm	1/11/2010	A8
<i>Philadelphia Inquirer</i>	3 columns x 7 in/cm	1/18/2010	A10
<i>San Francisco Chronicle</i>	1/6 Page	1/11/2010	A7
<i>San Francisco Chronicle</i>	1/6 Page	1/18/2010	A4
<i>Washington Post</i>	3 columns x 7 in/cm	1/11/2010	A2
<i>Washington Post</i>	3 columns x 7 in/cm	1/18/2010	A3
Newspaper Supplement(s)			
<i>Parade</i>	2/5 Page (5.25" x 7")	1/17/2010	23
<i>USA Weekend</i>	2/5 Page (5" x 6.625")	1/10/2010	8